



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

JUL 17 2003

MEMORANDUM FOR LINDA STIFF
DIRECTOR COMPLIANCE W:CP
FROM: *Mary Power for*
Charlene Wright Thomas
Acting Privacy Advocate CL:PA
SUBJECT: Automated Collection System (ACS)
Privacy Impact Assessment (PIA)

The Office of the Privacy Advocate has reviewed the Privacy Impact Assessment for the Automated Collection System. Based on the information you provided, we do not have any privacy concerns that would preclude this system from operating. However, a revised PIA is required when considering any future upgrades or major modifications to the system or before the project progresses to the next milestone.

We will forward a copy of the PIA to the Director, Security Services Mission Assurance Certification Program Office to be included in the Security Accreditation Package for formal acceptance for operation. The Director, Security Policy Support and Oversight, which has security oversight responsibility, may request information concerning the statements contained in the PIA to ascertain compliance with applicable requirements.

If you have any questions please contact me at 202-927-5170, or your staff may contact Susan Dennis at 202-927-4287.

Attachment

cc: Director, Security Services Mission Assurance, Certification Program
Office M:S:A
Director, Security Policy Support and Oversight M:S:S
Division Information Officer LMSB *slf*

Date July 15, 2003

MEMORANDUM FOR CHARLENE W. THOMAS
ACTING PRIVACY ADVOCATE CL:PA

FROM: Richard Perry, Branch Chief Exam and ACS Services
M:I:B:CS:ES

SUBJECT: Request for Privacy Impact Assessment (PIA) –
Automated Collection System

Purpose of the System:

Automated Collection System (ACS) controls Integrated Data Retrieval System (IDRS) balance due and non-filer cases requiring telephone contact for resolution. The system uses Automated Call Distributors (ACD's) to handle automated scheduling and follow-ups of incoming and outgoing calls, and generates levies and correspondence. ACS is a legacy Tier 1 system running in the 10 service centers supporting 14 call sites. It was developed in the early 1980's, to allow the IRS to contact taxpayers by telephone and collect delinquent taxes. ACS controls IDRS balance due and non-filer cases requiring telephone contact for resolution. Tax Examiners use ACS' case management abilities to contact taxpayers, review their case histories, and issue notices, liens, or levies to resolve the cases.

Name of Request Contact:

Name: Andrea Hawley
Organization Name & Symbols: Automated Collection System M:I:B:CS:ES:AU
Mailing Address: 5000 Ellin Road, Lanham, MD 20706
Phone Number (with area code): (202) 283-3082

Name of Business System Owner:

Name: Debbie A. O'Camb
Organization Name & Symbols: Wage and Investment W:CP:SPC:ACS
Mailing Address: 850 Trafalgar Court, Maitland (Orld), FL, 32751
Phone Number (with area code): (407) 660-5820

Name of Business System Owner:

Name: Bedell Terry
Organization Name & Symbols: Small Business/Self-Employed S:C:CP:FP:CCC
Mailing Address: 5000 Ellin Road, Lanham, MD 20706
Phone Number (with area code): (202) 283-2325

Requested Operational Date: 7/31/2003

Category: (Reason PIA is required--enter "y" or "n" and applicable dates)

New System?: N

Recertification? (if no change, enter date of last certification) July 2000

Modification of existing system?: N

Is this a National Standard Application (NSA)?: N

Is this a Modernization Project or System? N

If yes, the current milestone?: (Enter 1-5; explain if combining milestones)

System of Record Number(s) (SORN) #: *(coordination is required with Office of Disclosure--contact David Silverman, 202-622-3607)*

Treasury/IRS 26.019 Taxpayer Delinquent Account Files

Treasury/IRS 34-137 IRS Audit Trail and Security Records Systems

Attachment: PIA

Data in the System

<p>1. Describe the information (data elements and fields) available in the system in the following categories:</p> <ul style="list-style-type: none"> A. Taxpayer B. Employee C. Audit Trail Information (including employee log-in info) D. Other (Describe) 	<ul style="list-style-type: none"> A. <u>Taxpayer</u> information available on ACS relates to a delinquent account (TDA) or delinquent return (TDI). TDA and TDI information is extracted from IDRS or may be input into the system by users of ACS. Information (liens, levies, levy sources, assets, seizure activity, address, Power of Attorney (POA), payments, closing information, history) may be added to the case file by users of ACS/Entity and is then uploaded to IDRS. B. Minimal <u>employee</u> information is stored on the system for the purpose of assigning the taxpayer cases to them, controlling workload, and generating documents/correspondence with the employee's work address, work telephone number, employee's email address, title, grade and employee identification number. C. <u>Audit trail</u> information identifying the employee and about each action taken on a case is captured and stored. Employee log-in information is currently captured.
<p>2. Describe/identify which data elements are obtained from files, databases, individuals, or any other sources.</p> <ul style="list-style-type: none"> A. IRS B. Taxpayer C. Employee D. Other Federal Agencies (List agency) E. State and Local Agencies (List agency) F. Other third party sources (Describe) 	<ul style="list-style-type: none"> A. <u>IRS</u> - IDRS, Business Masterfile and the Automated Lien System (ALS) are the sources of data relating to a taxpayer on the system. CADS is the source of the employee's email address. B. <u>Taxpayer</u> - Case information may be gathered from the taxpayer during an investigation. This information has to do with the taxpayer's income, expenses, assets and liabilities. Once gathered, it is key input into the system by ACS users. C. <u>Employee</u> - Case information is gathered by IRS employees during field investigations. This information is based on a review of public records or obtained from the taxpayer during personal interviews. D. <u>Other Federal Agency</u> - No data is received electronically from a federal agency. If data is received during a field visit, it is key input into the system by an ACS user. E. <u>State and Local Agencies</u> - No data is received electronically from a state agency. If data is received during a field visit, it is key input into the system by an ACS user. F. <u>Other third party sources</u> - Revenue Officers will contact other third party sources (creditors, neighbors, employers, former employers, etc.) to secure information.
<p>3. Is each data item required for the business purpose of the system? Explain.</p>	<p>Yes, each data item is required by the system. Each user receives their case inventory electronically and then is able to work the case electronically, i.e., contacting taxpayer, generating correspondence, issuing liens and levies and closing cases. MIS reports and statistical trends are produced using the information in the system.</p>

4. How will each data item be verified for accuracy, timeliness, and completeness?	<p>Information that has significance to a determination of a tax liability or a penalty is verified by looking at bank records, corporate files and other official sources. Information pertaining to the taxpayer's financial situation is verified by reviewing courthouse records and by contacting creditors to verify balances due.</p> <p>Appropriate validity and consistency checks are built into the automated system.</p>
5. Is there another source for the data? Explain how that source is or is not used.	No.
6. Generally, how will data be retrieved by the user?	The ACS system makes the data available to users on a need-to-know basis. All SBSE/Customer Service employees and their managers who work a given inventory of cases are allowed access to their inventory. System administrators and developers also have access to the data for maintenance purposes.
7. Is the data retrievable by a personal identifier such as name, SSN, or other unique identifier?	A user's inventory of data is displayed/presented to them. A given case in their inventory may then be selected from the list of cases. Also, a specific case not part of an employee's assigned inventory may be requested by EIN/SSN.

Access to the Data

8. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Others)?	Users, managers, system administrators and developers have access to the data in the system.
9. How is access to the data by a user determined and by whom?	<p>An ACS user has access to specific cases via TIN. Access is granted based on the duties of the employee, and only on a need-to-know basis.</p> <p>Form 5081 is required for employees who need to have access to ACS system as a part of their official duties. By signing this form, employees indicate their understanding and agreement to abide by the rules of behavior for accessing sensitive taxpayer data. The Form 5081 insures that the user is accountable for his/her misuse of the system.</p>

<p>10. Do other IRS systems provide, receive, or share data in the system? If YES, list the system(s) and describe which data is shared. If NO, continue to Question 12.</p>	<p>Yes, ACS interfaces with the following applications that send data; Daily Transaction Register (DTR), Generalized Mainline Framework (GMF), Integrated Case Processing (ICP), Inventory Delivery System (IDS), Standard CFOL Overnight Processing (SCOP), Taxpayer Delinquency Investigation (TDI), and Taxpayer Delinquent Account (TDA).</p> <p>ACS interfaces with following applications that receive data; 6020(b) Substitute For Return (6020(b)), Automated Liens System (ALS), Integrated Case Processing (ICP), Inventory Delivery System (IDS), Standard CFOL Overnight Processing (SCOP), and Taxpayer Delinquent Account (TDA).</p> <p>The data that is shared is levy verification, transactions, TDI extracts, Refund Hold records, TDA extracts, levy sources, and lien information.</p>
<p>11. Have the IRS systems described in Item 10 received an approved Security Certification and Privacy Impact Assessment?</p>	<p>Yes</p>
<p>12. Will other agencies provide, receive, or share data in any form with this system?</p>	<p>No</p>

Administrative Controls of Data

<p>13. What are the procedures for eliminating the data at the end of the retention period?</p>	<p>When a taxpayer case is closed, the closing information is made part of the taxpayer records on IDRS and Masterfile. The case is maintained on the ACS mainframe as a closed case for six months. Portions of the closed case are then archived. The archived files are available for three years and then are destroyed. Any backup files maintained by the system are destroyed at the end of their retention period, which is documented in the Computer Programmer Books (CPB's) used at the Computing Centers. Retention periods are based on</p> <p>Data will be kept according to data retention standards found in IRM 1.15.2. Operationally, the tax return and collection data is to be retained during the statutory period for collection (three years) plus two years.</p>
<p>14. Will this system use technology in a new way? If "YES" describe. If "NO" go to Question 15.</p>	<p>No</p>

15. Will this system be used to identify or locate individuals or groups? If so, describe the business purpose for this capability.	No
16. Will this system provide the capability to monitor individuals or groups? If yes, describe the business purpose for this capability and the controls established to prevent unauthorized monitoring.	No, except for the ability to monitor employee workloads and actions taken on cases. For that purpose, the manager has a security profile and can view and monitor individuals or groups of employees.
17. Can use of the system allow IRS to treat taxpayers, employees, or others, differently? Explain.	No. Use of this system does not deny any individuals any rights they may have by law, including rights to appeal assessments or other decisions that may be statutorily contested.
18. Does the system ensure "due process" by allowing affected parties to respond to any negative determination, prior to final action?	Yes. Checks are built in to the system to prevent premature or inappropriate actions. Taxpayers are still entitled to the same appeal rights as other taxpayers who cases are not worked in the ACS system.
19. If the system is web-based, does it use persistent cookies or other tracking devices to identify web visitors?	No. The system is not web-based.